

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE 2014 RADIOSHACK ERISA
LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

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) MASTER FILE NO. 4:14-cv-00959-O
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**APPENDIX TO PLAINTIFFS' SUPPLEMENTAL MEMORANDUM IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS AND APPROVAL OF
PLAN OF ALLOCATION, AND FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND CASE CONTRIBUTION AWARDS TO THE
NAMED PLAINTIFFS**

DESCRIPTION	APPENDIX PAGE NO.
Supplemental Declaration of Amy Tadewald	APP-1 to APP-3

Dated: June 30, 2016

Respectfully submitted,

**KESSLER TOPAZ
MELTZER & CHECK LLP**

s/ Mark K. Gyandoh

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Mark K. Gyandoh

Mark K. Gyandoh

EXHIBIT A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION**

IN RE 2014 RADIOSHACK ERISA
LITIGATION

THIS DOCUMENT RELATED TO:
ALL ACTIONS

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§ Master File No. 4:14-cv-959-O
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SUPPLEMENTAL DECLARATION OF AMY TADEWALD

I, Amy Tadewald, declare as follows:

1. I am a Senior Project Manager for Rust Consulting, Inc. ("Rust"). My business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402-2469. My telephone number is (612) 359-2031. I am over twenty-one years of age and am authorized to make this declaration on behalf of Rust and myself.

2. Rust has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance and consumer issues. We have provided notification and/or claims administration services in more than 4,500 cases. Of these, more than 1,700 were Labor & Employment cases.

3. Rust was engaged by Class Counsel to provide notification services in the *In Re 2014 RadioShack ERISA Litigation*. Duties included, *inter alia*: a) preparing, printing and mailing of the Notice of Class Action Settlement ("Class Notice"); b) preparing and causing the Notice by Publication of Proposed Class Action Settlement and Settlement Fairness Hearing ("Publication Notice") to be published; and c) receiving and reviewing written objections submitted by Settlement Class Members.

4. On April 8, 2016, Class Notices were mailed to 4,424 Settlement Class Members contained in the Class List via First-Class mail. The Class Notice advised Settlement Class Members that they could submit a written objection postmarked by June 20, 2016.

5. After the initial Class Notice mailing, 258 Class Notices were returned as undeliverable. Of the 258 Class Notices returned as undeliverable, Rust performed 230 address traces on Class Notices returned as undeliverable for the first time. The address trace utilizes the Settlement Class Member's name, previous address and Social Security Number for locating a current address. Of the 230 traces performed, 197 more current addresses were obtained and Class Notices were promptly re-mailed to those Settlement Class Members via First-Class mail. Of the 230 traces performed, Rust did not obtain updated addresses for 33 undeliverable Class Notices. Of the 197 Class Notices mailed to a more current address identified from trace, 28 Class Notices were returned to Rust as undeliverable for a second time. As of this date, seven (7) Class Notices were returned by the Post Office with forwarding addresses attached. Rust promptly re-mailed Class Notices to those Settlement Class Members via First-Class mail. As of this date, 61 Class Notices remain undeliverable, resulting in approximately a 99.99% Class Notice delivery success rate (i.e. 4,363 Class Notices have not been returned as undeliverable).


6. The toll-free phone number of (877) 522-0442 was established to provide Settlement Class Members with information pertaining to the Settlement via an IVR or by speaking to a live operator. As of this date, the IVR line has received 75 phone calls. Of those calls, no Settlement Class Member messages were forwarded to Class Counsel to return.

7. The Internet address www.RSHTrusteeSettlement.com was reserved by Rust for this Settlement. The Internet address was provided in the mailed Class Notice and Publication Notice, and was also listed via recording on the IVR telephone support line. The website allows Settlement Class Members to review the Class Notice, Publication Notice, Court documents and commonly asked questions about the Settlement.

8. As of this date, the website has received 252 unique visitors to the website. Settlement-related documents have been downloaded 46 times.

9. The Class Notice advised Class Members of their right to object to the Settlement, provided that their written objection was received by the Court and by Counsel no later than June 20, 2016. As of this date, Rust has neither received nor been notified of any objections to the Settlement.

10. I declare under penalty of perjury under the laws of the State of Minnesota and the United States that the above is true and correct to the best of my knowledge and that this Declaration was executed this 29th day of June 2016, at Minneapolis, MN.


AMY TADEWALD